



# Written Statement [MGY101]

## *Written Statement for 100 Sebastopol Rd Application*

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### Conditional Use Permit Application

**Applicant:** OSC, Inc. (DBA Old School Cannabis)

**Address:** 100 Sebastopol Rd. Santa Rosa, CA 95407

**APN:** 125-181-023

**Zoning:** IL (Industrial Light).

**Building Size:** 20,433 Sq Ft

**Lot Size:** 1.79 Acres

**Proposed Use:** 2,350 sq. ft. for Cannabis Retail (Type 10); 17,120 sq. ft. for Cannabis Cultivation (Type 2A); 870 sq. ft. for Cannabis Distribution (Type 11); and 500 sq. ft. for volatile Cannabis Manufacturing (Type 7)

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3. Owner Consent Form
4. Copyright Materials Release
5. Disclosure Form
6. Storm Water Determination Worksheet
7. Vicinity Map
8. Neighborhood Context Map
9. Site Plan
10. Site Photos
11. Floor Plans
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## Project Summary

Old School Cannabis aims to develop a vacant industrial space at 100 Sebastopol Rd into a modern, customer-focused cannabis dispensary, cultivation, distribution, and manufacturing facility that will be a commercial cannabis hub and community anchor for Santa Rosa and the Roseland community.

The Old School Cannabis dispensary will be a low-profile, but active retail cannabis operation. At full capacity, the facilities will employ between 10 and 15 staff and serve an estimated 100 to 200 customers per day. Dispensary hours will be 9:00 am to 9:00 pm, 7 days per week, where remaining use hours will be from 6:00AM to 9:00PM. The dispensary will provide a variety of high-quality and fully-tested brand name cannabis products in a modern, polished retail setting that is consistent with the direction of California's regulated cannabis market.

The Old School Cannabis team is excited for the opportunity to be a positive steward for the cannabis industry in Santa Rosa and Sonoma County and looks forward to working with state and local organizations to create a model for safe, efficient, and socially responsible cannabis operations.

## Description of Business

This project proposal and permit request is for a Conditional Use Permit (CUP) for multiple cannabis uses, including delivery privileges and on-site consumption privileges.

The CUP is to occupy an existing 20,433 sq. ft. industrial building with 2,350 sq. ft. (Suite A) for Cannabis Retail (Type 10); 17,120 sq. ft. (Suite B) for Cannabis Cultivation (Type 2A); 870 sq. ft. (Suite C) for Cannabis Distribution (Type 11); and 500 sq. ft. (Suite D) for volatile Cannabis Manufacturing (Type 7), totaling 20,840 sq. ft. The discrepancy in the existing total sq. ft. (20,433) and the proposed total sq. ft. (20,840) represents the sq. ft. that will be added to the cultivation canopy area through the use of stacking light racks.

Our goal is to create Santa Rosa's premier cannabis production and sales hub by focusing on quality, customer service, and community-building. Beyond growing, manufacturing, distributing and selling cannabis, we plan to promote the benefits of cannabis by providing educational resources that highlight cannabis' positive effects on health and general well-being. We are dedicated to providing economic opportunities for our community members and will do so by fostering their participation in California's burgeoning legal cannabis industry. After our community outreach and collaboration efforts with the surrounding community are completed, we plan to submit our Old School Cannabis' Community Benefits Report as an addendum to this application. This report will demonstrate the outreach conducted with the community, as well as how Old School Cannabis will benefit the community, including through donating a portion of our revenue to charitable causes and community outreach programs that benefit marginalized groups throughout Santa Rosa and particularly toward the Roseland community.

## Women-Owned & Local Business

We are particularly proud to submit this application in the month of March during Women's History Month, and specifically on March 8, 2021, international Women's Day. Women's History Month is an annual

declared month that highlights the contributions of women to events in history and contemporary society. We truly believe that this application demonstrates a significant contribution to the cannabis industry in California generally, but also for women specifically.

When our community supports women owned businesses, you are investing in women's economic empowerment, gender parity in commerce, vibrant communities, and the growth of the economy overall. The cannabis industry is a new industry and one poised to overcome the gender biases and sexism. In fact, women entrepreneurs make up a growing share of U.S. small business owners. The American Express 2018 State of Women-Owned Businesses report, which makes its projections based on data from the most recent U.S. Census Bureau Survey of Business Owners, estimates that women own 12.3 million companies in the U.S. – compare that to 1972 when there were only 402,000 women-owned businesses. Today, women employ more than 9.2 million people and generate \$1.7 trillion in revenue. Last year, 1,821 women-owned businesses were launched every day. Despite these numbers, and while women make up more than 50 percent of the US population, only 29 percent of businesses are owned by women. With this application, we aim to tilt the scales for the empowerment of women in the cannabis industry and invite you to join us in this task. After all, empowered women empower women, and our leadership reflects that:

### **Cede Hunter**

Cede Hunter was born and raised in our home region of beautiful Northern California. She inherited her passion for cannabis from her father, Dennis Hunter - a well-known and industry-wide respected pioneer in the cannabis industry and a leader in the Santa Rosa community. Since she was a child, Cede has always been around cannabis plants and the cannabis community. In fact, Cede experienced first-hand the trials and tribulations imposed on so many as the transition has occurred from the unregulated into the legal cannabis market. From enduring raids to protesting, she quickly became an advocate for patient rights and policy reform, and is now proud to submit this application for her own legal cannabis operation. Her strong entrepreneurial spirit led her to start her own cannabis ventures, including Old School Cannabis.

### **Nayeli Rivera**

Nayeli was born to Mexican parents who immigrated to Sebastopol, CA in 1976. She was born and raised in Petaluma alongside her three brothers. Her family were pioneers of the Latino Community in Sonoma County. Her father, an immigration counselor, took Nayeli under his wing where she started volunteering and marching for justice and equality for all. She would help him with translations and appointments with his clients at even an early age. This led to her working as an interpreter at the U.S. Citizen and Immigration Services office in San Francisco. There she practiced compassion and humility when providing her services. Most of the time her services were on a donation basis as many of her clients were low income families. From there she worked as an interpreter with the Sonoma County office of Education supporting the Deaf & Hard of Hearing program. She accompanied families to doctor's appointments and offered her services beyond interpreting. Many of the families were new to the country and had no support. She would routinely go above and beyond to help these families overcome many obstacles and hardships. In 2010 she moved on to working in the wine industry through her family's business as farm labor contractors in Napa County. While there she quickly gained business experience and was able to make her

mark in a predominately male run industry. Her desire to continue to grow and learn in business started there and continues to bloom.

Nayeli had a son while in High School but not only managed to graduate from High School with honors, she received a full ride scholarship to Sonoma State University. She married her husband, Nathan, in 2009 and together they had two more children growing up in Santa Rosa. In 2016 Nayeli and Nathan opened a premier plant-based organic restaurant in Santa Rosa, CA and continue to support the healthy living movement. Today they raise their family together in Sebastopol, CA.

Her business philosophy includes creating opportunity for women and people of color so that together our community can thrive. Breaking the stigma associated with cannabis in the Latino community as well as breaking the glass ceiling is part of Cede's passion.

## Compliance with State Law

Upon local approval of this application, Old School Cannabis will be applying for a state license through the Bureau of Cannabis Control (BCC). We will be applying for a License "Type 10" as a retail dispensary; as well as a License "Type 2A" as a cannabis cultivation facility; a License "Type 11" as a cannabis distribution facility; and a License "Type 7" as a volatile cannabis manufacturing facility.

These are the appropriate license types for Old School Cannabis at the proposed location as our operations will comply with the following state definitions:

**Type 10:** A storefront retailer (Type 10) licensee sells cannabis goods to customers at its premises or by delivery. A storefront retailer must have a licensed physical location (premises), including address, where commercial cannabis activities are conducted.

**Type 2A:** "Small Indoor" is an indoor cultivation site between 5,001 and 10,000 square feet of total canopy. (Cal. Code Regs. tit. 3 § 8201)

**Type 11:** "Distribution" of medical cannabis and medical cannabis products from manufacturer to dispensary. A Type 11 licensee shall hold a Type 12, or transporter, license and register each location where product is stored for the purposes of distribution. A Type 11 licensee shall not hold a license in a cultivation, manufacturing, dispensing, or testing license category and shall not own, or have an ownership interest in, a facility licensed in those categories other than a security interest, lien, or encumbrance on property that is used by a licensee. A Type 11 licensee shall be bonded and insured at a minimum level established by the licensing authority."

**Type 7:** "Manufacturer 2" Manufacturing sites that produce cannabis products using volatile solvents.

We will be applying for a "Category A" license which denotes that we will be working within the adult-use cannabis community, and a "Category M" license which denotes that we will also be working within the medical cannabis community for each of the above uses listed.

## State Business Compliance

Old School Cannabis has registered with the Secretary of State, and are currently in the process of applying for our Seller's Permit and Employment Identification Number (EIN). This information will be made available as soon as they're processed by the respective agency.

## Dual Licensing

Old School Cannabis will acquire all necessary state and local licensing available for the cannabis cultivation, manufacturing, distribution, and retail business. Upon receipt of local authorization, we will apply for our annual state licenses through the California Department of Public Health (CDPH), the California Department of Food and Agriculture (CDFA), and the bureau of Cannabis Control (BCC). Old School Cannabis will not commence commercial cannabis operations until we have received all necessary state licenses and agency permits. We will ensure that our state licenses are obtained in a timely manner following local approval.

## Background Checks in Hiring

In keeping with both the letter and the spirit of California's "Ban the Box" law, Old School Cannabis will not request criminal histories from, nor conduct criminal background checks on, any candidates prior to issuing a conditional offer of employment. Once such an offer is made, we will request voluntary disclosure of criminal history and may conduct criminal background checks to determine if convictions for violent, predatory, or honesty crimes indicate reconsideration of the offer. Old School Cannabis will not conduct credit checks, and any background checks will be conducted in strict compliance with local, state, and federal notice, disclosure and appeal requirements.

## Minors

Old School Cannabis will not employ anyone under the age of 21 in compliance with state and local regulations. We will also not allow anyone under the age of 21 onto the premises. We will post signs at the entrance to our licensed premises stating the age requirements to qualify entering onto the premises. Record of facility visitors will be kept on file in the on-site administrative office for up to one year, or another reasonable amount of time as defined by city and state regulations.

## Inventory and Tracking

Old School Cannabis will comply with all state and local requirements regarding the prevention of cannabis diversion and will comply with all track-and-trace programs established by the state. We will implement an inventory plan to track the location and disposal of all cannabis goods and products on the premises. Old School Cannabis will assign one owner to be the track-and-trace account manager who will ensure compliance with *Cal. Code Regs. tit. 17, § 40510 through 40517*. The account manager will record all commercial cannabis activity into the state approved track-and-trace system, METRC, within 24-hours of the activity. We will reconcile our inventory tracking system at least once every 30 calendar days. This reconciliation will be performed by one designated employee and will be independently verified by a second employee.

All deliveries and pickups of inventory or controlled materials will be made using a secure loading area behind a dedicated roll-up door. Licensed distributors or couriers can pull into the port, close the rolling door behind them, and proceed with the transaction. All cannabis waste will be disposed of in accordance with *Cal. Code Regs. tit. 17, §40290*. All cannabis waste will be disposed of in a secured waste receptacle. At the time of disposal, all cannabis products will be unrecognizable and unusable. No packaged goods in their entirety will be disposed of. All cannabis waste will be entered into the state's track-and-trace system, METRC.

## Multiple Permits per Site & Separation of License Types

In compliance with this section of the General Operating Requirements, Old School Cannabis will not operate multiple cannabis businesses unless it has received both local and state authorization beforehand.

This project proposal and permit request is for a CUP for Cannabis Retail, Cultivation, Distribution, and Manufacturing to include on-site consumption (in the dispensary only) and delivery privileges. Although there will be multiple permits operating on a single parcel, each use will be clearly and distinctly separated from one another, as required by both state and local law. We will not commence any commercial cannabis operations at this site until we receive local authorization and all necessary state licenses for the permit and license type.

## Transfer of Ownership or Operator

Old School Cannabis acknowledges that a permittee shall not transfer ownership or operational control of a Cannabis Business or transfer a permit for a Cannabis Business to another person unless and until the transferee obtains a zoning clearance from the Planning Department stating that the transferee is now the permittee. The zoning clearance shall commit the transferee to compliance with each of the conditions of the original permit. 2046.050(f)

In the event that Old School Cannabis wants to transfer ownership, the transferee will obtain an administrative permit from the Planning Department that verifies compliance with the requirements of the City of Santa Rosa's Cannabis Ordinance and names the transferee as the new permittee. We understand that owners, including new owners, are required to comply with the conditions of the original permit. We will also ensure that any transfer of ownership complies with applicable state laws.

## Locational Criteria

Old School Cannabis will operate at 100 Sebastopol Rd. Santa Rosa, CA 95407. The site is within a parcel (APN: 125-181-023) designated as an IL (Industria Light). As stated in the [Santa Rosa Comprehensive Cannabis Land-Use Policy Chart](#) IL (Industria Light) zones allow for all the license types pursued in this application under the CUP process.

## Building and Fire Permits

Old School Cannabis will obtain all building permits with the appropriate occupancy classification and will comply with Section 20-46.050 (E) of the City Code. Old School Cannabis will obtain fire permits with



inspections by the Santa Rosa Fire Department occurring prior to beginning operations. We will obtain these licenses annually.

We will comply with all applicable Health and Social Care and California Fire Code requirements as it relates to the storage, use, handling and generation of hazardous materials. We do not plan to use any hazardous materials, but in the event that we do, we will obtain all required Certified Unified Program Agency (CUPA) permits and will complete a California Environmental Reporting System (CERS) submission for hazardous materials inventory and any waste generation that meet or exceed State thresholds for accountability. In addition, we will maintain the existing lock box that contains keys to our gates and doors for potential emergency use by the Santa Rosa Fire Department.

## Security

The Old School Cannabis security plan complies with both the Cal. Code Regs. tit. 17, §40200 as well as exceeds the minimum requirements pursuant to Section 20-46.050(G) of the Santa Rosa Cannabis Ordinance. It will include twenty-four hour security cameras, a professionally monitored alarm system, on-call emergency contacts, secure product and cash storage, and code compliant building security features.

The safety and security of Old School Cannabis employees, guests, neighbors, and products are of the highest priority to us. To demonstrate this we have developed the attached Security Plan, designed to comply with all applicable local and state requirements. (Attachment: Security Plan)

Through assistance from cannabis industry experts and third-party professional security consultants, Old School Cannabis is establishing security practices involving physical and operational standards used by successful cannabis businesses throughout California. A combination of security technologies and strict operational procedures are intended to prevent crime and diversion, deter nuisance activity, and protect both Old School Cannabis staff and businesses of the surrounding area.

Old School Cannabis has hired Bay Alarm to assist in security planning and ongoing monitoring and surveillance of the retail and cultivation facility. Bay Alarm has extensive experience working with cannabis businesses throughout Northern California and advises on best practices and implementation of security systems to protect their operations.

All cannabis waste will be disposed of in accordance with *Cal. Code Regs. tit. 17, §40290*. All cannabis waste will be disposed of in a secured waste receptacle for pick up and entered into the state's track and trace system, METRC. All cannabis products and associated product waste shall be stored and secured in a manner that prevents diversion, theft, loss, hazards and nuisance.

Employee training will comply with *Cal. Code Regs. tit. 17, §40280*. All staff members will be trained on Old School Cannabis's security procedures and will also be trained on compliance with city regulations and state law. Employee training plans are prepared and will be in place, not only for safe operation within the facility but also for safely entering and exiting the facility. The "buddy system" will be used between dusk and dawn for all employees coming or going from the building. This is a controlled retail and cultivation facility, and will only be occupied by employees and customers over the age of twenty-one.

For more information, please see our Operational Security Measures within the attached Security Plan.

## Operational Security Measures

### Premises Management

The safety and security of Old School Cannabis's employees, guests, neighbors, and products are of the highest priority to us. Through assistance from cannabis industry experts and third-party professional security consultants, Old School Cannabis is establishing security practices involving physical and operational standards used by successful cannabis businesses throughout California. A combination of security technologies and strict operational procedures are intended to prevent crime and diversion, deter nuisance activity, and protect both Old School Cannabis staff and residents of the surrounding area.

Old School Cannabis will hire private security to assist in security planning and ongoing monitoring and surveillance of the manufacturing facility. Our security team will have extensive experience working with cannabis businesses throughout Northern California to advise on best practices and implement security systems to protect their operations.

### Points of Ingress and Egress

In compliance with *Cal. Code Regs. tit. 17, § 40200*, our written security plan will prevent access to our manufacturing premises by unauthorized persons and will protect the physical safety of our employees. We will install physical access barriers and a security alarm system. We will create a detailed log that identifies authorized personnel, suppliers, contractors, and visitors on the premises. We will maintain the premises in a manner that enhances security. We will establish written procedures to investigate suspicious activities on our premises.

### Locks

All points of ingress and egress to our premises will be secured with Building Code compliant commercial-grade, non-residential locks and window locks. All exterior doors at our location will be security-grade doors.

### Security Video Surveillance

Old School Cannabis will install security cameras on the licensed premises and will record continuously twenty-four (24) hours per day, 7 days a week, at a minimum speed of 15 frames per second with a resolution of 1280 x 720 pixels. The security cameras will record:

- All internal and exterior entrances and exits to the premises;
- Areas where cannabis products are weighed, packed, stored, quarantined, transported, prepared, or moved within the premises; and
- Limited-access areas; security rooms; and areas with surveillance-storage devices.

The security cameras will be oriented in a manner that provides clear and certain identification of all individuals within those areas. All security records are to be kept for a minimum of 90 days and will be

immediately available on the premises for inspection upon request. The security video surveillance system will feature a failure notification system that will alert Old School Cannabis of any disruption of surveillance or storage of video footage. The security system will also have a battery backup in case there is an electrical interruption or failure.

## **Alarm System**

Old School Cannabis's premises will be equipped with an alarm system monitored by a local permitted security services company. Alarms and sensors will be placed at all points of entry and exit, including windows. The alarm system will be maintained regularly to ensure it operates at optimum levels. We will keep the alarm company's contact information as part of our on-site records. The security services company will be in direct contact with the manager of Old School Cannabis and the Santa Rosa Police Department.

An owner or manager will be designated as the local site contact person for the security services company and on-call emergency contact for the Santa Rosa Police Department. They will be in charge of ensuring that the alarm system is fully functional. They will also ensure that the Santa Rosa Police Department has their current contact information and that they can be reached quickly in case of an emergency.

## **Secure Storage**

Old School Cannabis will store all cannabis goods and currency in a limited-access secured area to prevent diversion, theft, and loss. The area will have multiple security cameras and will include an additional layer of reinforcement within the walls. Only managers will have access to the secured area and the contents stored within.

All cannabis products and waste will be stored and secured in a manner that prevents diversion, theft, loss, hazards and nuisance. All cannabis waste will be disposed of in full compliance with all laws and all cannabis waste will be unrecognizable and unusable at the time of disposal. All cannabis waste will be placed in a locked waste receptacle that will be hauled by Recology. All cannabis waste will be entered into the state's track-and-trace system, METRC.

## **Transportation**

Old School Cannabis will ensure the safe and secure transportation and delivery of cannabis and cannabis products and currency in accordance with state law. A licensed distributor will transport all raw cannabis goods to the premises and transport all finished products from the premises. All areas where cannabis or cannabis products are transported will be under video surveillance. We will enhance our security by randomizing our transportation routes and times to avoid predictability.

## Emergency Access

In compliance with the California Fire Code and Santa Rosa Fire Department Standards, we will also install a lock-box to provide keys to all doors to ensure emergency access.

## Notification of Theft, Loss, or Diversion

Old School Cannabis's security plan will prevent theft and loss of cannabis and cannabis products. Our inventory system will track cannabis and cannabis products, along with the personnel responsible for processing it. We will limit access to the premises to personnel in areas and schedules necessary to complete job duties. We will supervise tasks or processes with high potential for diversion. Our electronic records will be secured and backed up in a way that prevents unauthorized access and to maintain the integrity of the records.

## Security

In accordance with *Cal. Code Regs. tit. 17, § 40207*, we will notify the Department and local law enforcement within 24 hours of discovering evidence of theft or diversion of cannabis. We will provide written notification that includes the date and time of the incident, the law enforcement agency that was contacted, and a description of the incident listing the items that are missing.

Please see the attached Security Plan.

## Staff Training

All Old School Cannabis staff training will fully comply with *Title 17: Zoning Code, Chapter 17.360 Comprehensive Cannabis Regulations, Section 17.360.070 General Operating Requirements*. This staff training will cover Company Policy and our Handbook, Safety and Security, and Cannabis Compliance. Staff will be trained upon hiring and additionally at least once a year annually. Training plans will be provided to local Law Enforcement for review and all training records will be maintained on site and available to Law Enforcement upon request.

## New Employee Training

All new employees will be trained appropriately, and further training will be readdressed annually. Old School Cannabis will train all staff and will implement a training program that addresses the following: applicable California, City of Santa Rosa, and Sonoma County Health Services laws, regulations and conditions of approval; information regarding civil, criminal and administrative liability; procedures for preventing and refusing access, sales, and service to minors and obviously intoxicated individuals; procedures for checking legally acceptable forms of identification; safety and security procedures; incident reporting, law enforcement liaison policies; and our Good Neighbor Policy.

Per *Cal. Code Regs. tit. 17, § 40280*, all Old School Cannabis employees will receive annual refresher training to cover: quality control procedures; product quality plans; safe usage of equipment and safe work practices; cleaning and maintenance requirements, emergency operations. All training will be completed within 12 months of the previous training date. The training records that will be maintained will include: a

list of all personnel at the premises including name and job duties; documentation of training topics and dates of training completion; signature of each personnel and licensee verifying receipt of training or refresher training completed by the individual; any documentation attesting to the successful completion of the required training. Training records will be maintained and provided to the Santa Rosa Police Department upon request.

## **Company Policy and HR Handbook Training**

Each staff member of Old School Cannabis will receive handbook training with their manager and/or the head of Human Resources on their first day of employment. The handbook training will include basic Employment Policies and Procedures, Administrative Protocols, and our Good Neighbor Policy. Following initial Handbook Training a presentation is held in order to fully explore the company's mission and core values. Throughout the training, the employee will be given the opportunity to ask any questions or voice any concerns. At the end of the training session, the Old School Cannabis employee will sign an acknowledgement form, verifying in hard copy that they have been provided the initial training, given ample time to address any questions, and given a digital or hard copy of the employee handbook for reference.

## **Safety and Security Team Training**

At Old School Cannabis the safety and security of our staff and guests is a serious concern. The Safety and Security Training will cover our company's policies and procedures for de-escalation, identifying and preventing potential safety incidents, and incident reporting. These protocols, as well as safety team training records, will be stored in the Old School Safety Binder.

Safety Team members will take lead on the safety and security of the facility, however all staff will be made aware of general safety and security awareness, and expected to participate in the company-wide "safety culture" in which all employees share the responsibility for keeping themselves and one another safe and healthy.

## **Cannabis Compliance Training**

Cannabis Compliance Training is paramount to Old School Cannabis operating successfully and most importantly, legally. All employees will be trained on all applicable State laws and regulations as well as all applicable City laws, regulations and conditions of approval. Additionally, all Sonoma County Health Services regulations and laws will be included in our Cannabis Compliance Training. We will educate our staff members on civil, criminal, and administrative liability should compliance not be met.

## **Odor Control**

For Old School Cannabis, being a good neighbor means taking precautions to create a thoughtful Odor Control Plan. Old School Cannabis's odor control measures will ensure that cannabis odor is not detected outside of our unit as required by Santa Rosa City Code and state regulations. Our Odor Control Plan is

being prepared by Matthew Torre, Registered Professional Engineer at 15000 Inc., and is provided in this application. (Attachment: Odor Control Plan).

Old School Cannabis will meet and/or exceed the standards set by the City of Santa Rosa's Cannabis Ordinance, the Sonoma County Code (including sections 26-88-250 through 26-88-256), California Labor Code §§6300 et seq., and Title 8, California Code of Regulations §§ 332.2, 332.3, 336, 3203, 3362, 5141 through 5143, 5155, and 14301, as published in the CalOSHA Policy and Procedures Manual C-48, Indoor Air Quality as applicable.

The purpose of the Odor Control Plan is for implementing and maintaining building systems to effectively minimize transmission of odor between the building and surrounding areas.

Our measures include the installation of new HVAC and ventilation equipment, and our operational procedures have been designed to prevent the detection of any cannabis or cannabis-related odor from any area outside the retail and cultivation facilities.

All cannabis products will be securely stored in secure rooms with video camera surveillance. The Flowering, Product Storage, Veg, Trim Room, Mom/Clone Room, Dry room, and hall spaces will be tied into exhaust fan systems with activated carbon filters for odor control. The retail dispensary space shall be tied into a separate exhaust air system to further mitigate nuisance odors. Exhaust will be terminated at a minimum of 10'-0" from property lines and fresh air intakes into the building.

The cultivation rooms (Flowering, Veg, Mom/Clone) and drying rooms will be kept at neutral pressure and the freely communicating/adjacent hallway spaces will be kept under negative pressure by means of an exhaust system with activated carbon filters for odor mitigation. The exhaust discharge shall be designed to discharge the exhaust air away from any neighbors or pedestrians.

### **HVAC SYSTEM**

Our HVAC system has been designed with the specialized needs of a cannabis facility in mind. We have outlined a multi-layered approach to ensuring a no-impact operation at our cultivation and retail facilities that includes the following:

- Negative pressurization
- Carbon filtration
- Commercial-grade exhaust

Each filter will be provided with a magnehelic differential pressure gauge to measure the pressure drop across the filter, with initial and final filter pressure drop set points marked to indicate useable lifespan of the filter. Frequency of filter maintenance will strictly adhere to manufacturer's listed data and recommendation. To ensure that odor control is maintained to standard, new staff will be trained on the operation of the odor mitigation equipment with additional instructional refreshers and updates for the entire staff at least one time per year.

The combination of activated carbon air filtration and building pressure control represent the current best available technology. For anticipated comfort space conditioning systems, the building shall be provided

with MERV-13 filters on the fresh air intake side to limit particulate intake to the space and to enhance the overall quality of the supply-air to the occupants.

Additional odor mitigation practices at the proposed facility will include limiting access to cannabis storage areas and placing cannabis products in odor-preventing containers.

Please find further details located in the attached Odor Control Plan. (Attachment: Odor Control Plan).

## Lighting

Old School Cannabis will comply with Section 20-46.050(l) as well as with the City's Outdoor Lighting Ordinance (Section 20-30.080, Outdoor Lighting) Old School Cannabis will utilize best management technologies and practices for interior and exterior lighting to reduce glare, light pollution, and light trespassing onto adjacent properties. We plan to enroll in environmentally-friendly energy programs like Evergreen offered by Sonoma Clean Power. Additionally, we will install LED lights in our facility to ensure electricity is conserved. Lighting of the facility will be thoughtful to the surrounding properties. Exterior lighting will provide clear visibility for all outdoor areas of the premises and aid in security measures. Exterior lighting will be stationary and shielded to prevent light pollution and compliant with Building Code. Interior lighting will be similarly shielded to limit exterior glare onto adjacent properties.

Old School Cannabis's exterior lighting systems will serve security purposes in a manner sufficient to provide illumination and clear visibility to all outdoor areas of the premises, including all points of ingress and egress. Additionally, all exterior lighting will be stationary, fully shielded, directed away from adjacent properties and public rights of way, and of an intensity compatible with the neighborhood. All exterior lighting will be Building Code compliant and will comply with Section 20-30.080 (Outdoor Lighting.)

## Noise

Old School Cannabis will operate in full compliance with the City's Noise Ordinance (City Code, Chapter 17-16). We will use air conditioning and ventilation equipment that complies with City Code and we will not use generators except during an emergency situation to act as a short-term temporary backup system.

## Vehicle Parking Analysis

In this analysis Old School Cannabis provides a count of all parking spaces that are described on the Site Plan as well as demonstrates how Old School Cannabis meets and exceeds the parking requirements pursuant to Zoning Code Section 20-36.040, Table 3-4.

With over 60 dedicated and private parking spaces available directly on the property, Old School Cannabis is well situated to meet and exceed the demands from a fully operational multi-cannabis use facility. Compliance with Section 20-36.040, Table 3- 4 is demonstrated through the table below:

Old School Cannabis Uses:	Suite #	Gross Sq. Ft.	Vehicle Parking Ratio	Required Spaces*	Provided Spaces
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Retail	A	2,350	1 space for each 250 sf.	9*	41
Cultivation	B	17,120	1 space per 1,000 sf.	17*	17
Distribution	C	870	1 space per 1,000 sf	1*	1
Manufacturing	D	500	1 space per 350 sf	1*	1
TOTAL		20,840		28	60

*\*As Section 20-36.040 states, where application of the requirements in Table 3-4 results in a fractional requirement, a fraction of 0.5 or greater shall be increased to the next higher number and a fraction of less than 0.5 shall be reduced to the next lower number.*

## Bicycle Parking Analysis

In addition to exceeding the parking requirements for vehicles at the Old School Cannabis facility, this analysis provides a count of all bicycle parking requirements and spaces. The proposed bicycle parking spaces are illustrated in the attached Site Plan demonstrating how Old School Cannabis meets and exceeds the parking requirements pursuant to Zoning Code Section 20-36.040, Table 3-4.

Old School Cannabis Uses:	Suite #	Gross Sq. Ft.	Bicycle Parking Ratio	Required Spaces*	Provided Spaces
Retail	A	2,350	1 space per 5,000 sf.	0*	1
Cultivation	B	17,120	1 space per 14,000 sf.	1*	1
Distribution	C	870	1 space per 14,000 sf.	0*	1
Manufacturing	D	500	1 space per 7,000 sf.	0*	1
TOTAL		20,840		1	4

*\*As Section 20-36.040 states, where application of the requirements in Table 3-4 results in a fractional requirement, a fraction of 0.5 or greater shall be increased to the next higher number and a fraction of less than 0.5 shall be reduced to the next lower number.*



# Good Neighbor Policy

**Community Liaison:** Nayeli Rivera

**Contact Cell Number:** (707) 338-3140

**Contact Email:** Riverafarms@gmail.com

Our organization adheres to a strict good neighbor policy, which means:

1. We have a bilingual community liaison on staff who is always prepared to address any concerns that a neighbor may have.
2. We will offer neighbors the direct contact for this staff member who will be responsible for prompt replies on the next business day.
3. We will work to address these concerns directly and without having to involve city and county staff.
4. We will perennially check in with our direct neighbors to make sure that any concerns about our operation or ideas for its improvement are heard, as well we will report back to them on what we have done to address these concerns and ideas.
5. We will work to maintain and keep clean the roads leading to our property to help ensure that it is safe for both ourselves and our neighbors.
6. We will not engage in activities that may disturb the neighbors, including, but not limited to, odors, noise, light pollution, exhaust, and parking.
7. We will drive safely in and around the property.
8. We will be polite to our neighbors and their guests.
9. We will work to keep our parking area litter free around our location in order to support great neighbor relations.
10. Considering that we are in an industrial center but near to residential homes, we will conduct standard business efforts, such as conducting deliveries and exterior maintenance, during normal extended business hours, between 6am and 9pm, but not between the hours of 9pm and 6am.
11. We will treat our property and the neighboring properties with reverence and respect.
12. We will always be mindful of our sensitive operations and demonstrate the utmost respect to our neighbors, their guests, and their customers.
13. Each of our staff and customers will be made aware of the Good Neighbor Policy and will be disciplined or removed if they demonstrate unwillingness to comply with this policy.

## Retail Use Specific Requirements

If approved by the city, we will operate in accordance with this Retail Operations Plan and any associated plans or procedures that may be articulated as conditions of our conditional use permit. All plans are designed to adhere to Santa Rosa City Code (SRCC) Chapter 20-46, California Business and Professions Code §26000, and related city and state rules and regulations.

### Location Requirement

This section demonstrates how the proposed location complies with overconcentration and setbacks to schools requirements. Please see the illustration on the Site Plan demonstrating the storefront entrance is in a visible location that provides an unobstructed view from the public right-of-way [Section 20-46.080 (D)] (Attachment: Site Plan)

#### Overconcentration

Old School Cannabis recognizes that to avoid overconcentration, a Cannabis Retail use *shall not be established within 600 feet of any other Cannabis Retail use established within and permitted by the City of Santa Rosa.* [2046.080 (D)(1)] Therefore we have carefully reviewed the location in relation to neighboring and surrounding uses, of which there are no other Cannabis Retail uses within 600 feet of the proposed retail location.

#### Setback to schools

Old School Cannabis recognizes that Cannabis Retail shall be subject to a 600 foot minimum setback from any K-12 "school", as defined by the Health and Safety Code Section 11362.768. Therefore we are selected a location that is well beyond 600 feet from any surrounding "schools."

#### Visibility of entrance

The storefront entrance of the Old School Cannabis Retail facility shall be in a visible location that provides an unobstructed view from the public right of way.

### Medicinal/Adult Use

As part of the requirement of the Conditional Use Permit, Old School Cannabis shall operate the Cannabis Retail Dispensary and Delivery in accordance with Tables 2- 6 and 2- 10 and will operate as both a medical and adult use retail dispensary and delivery facility.

### Operations Plan

If approved by the city, we will operate in accordance with this Retail Operations Plan and any associated plans or procedures that may be articulated as conditions of our conditional use permit. All plans are designed to adhere to Santa Rosa City Code (SRCC) Chapter 20-46, California Business and Professions Code §26000, and related city and state rules and regulations.

The Retail Operations Plan serves as rules and protocols for running a compliant dispensary. Management will regularly examine our operations, along with legal counsel, to confirm that we are meeting all of our state and local compliance obligations, as well as conforming to our commitments to the City of Santa

Rosa and our neighbors. To the extent the principals and managers of Old School Cannabis determine that an operational change is warranted, we will ensure all updates to the operations plan are timely and effectively communicated to appropriate city staff and neighborhood partners.

### **Edible products**

Old School Cannabis recognizes that cannabis businesses that sell or manufacture edible medical cannabis products shall obtain a Sonoma County Health Permit. In compliance with Health and Safety Code Section 13700 et seq. and Sonoma County Health permit requirements, Old School Cannabis will pursue this permit during the Santa Rosa planning process so each may be submitted immediately to the relevant regulatory agencies should we receive a conditional use permit. Old School Cannabis will acquire this permit prior to operations.

### **Employee Register**

Following plan check, we anticipate a period of 4-8 weeks to complete interior build-out and city inspections. We will commence initial recruiting and hiring during that time, as well as begin contracting with licensed distributors for delivery of initial inventory. Initial staff training will be conducted from first hire up through opening day.

### **Records in compliance with state law**

Old School Cannabis will maintain detailed personnel records for anyone currently or previously employed by the dispensary. Personnel records, which shall at a minimum include application materials, training records, wage and benefit documents, and disciplinary records, will be maintained for a minimum of seven years in accordance with 16 CCR §6037(a). Per SRCC §20-46.080(F)(1), an up-to-date register of all employees will be made available to city officials upon request.

### **Protocol and requirements for patients and persons entering**

Old School Cannabis will issue all employees a laminated employee badge that meets the requirements of 16 CCR §5043. Old School Cannabis employee badges will identify the company name, state cannabis license numbers, employee name and position, and a unique employee identification number, along with a 1 x 1.5-inch color headshot of the employee. Employees will be required to display their employee badges whenever they are on the dispensary premises in an official capacity.

No person shall be permitted to enter a Cannabis Retail facility without government issued photo identification. Further, Old School Cannabis will not provide Cannabis or Cannabis Products to any person, whether by purchase, trade, gift or otherwise, who does not possess a valid government -issued photo identification card.

### **Secured Access**

A dedicated security kiosk will occupy the front entryway of the dispensary. Upon entry, guests will be greeted by a Security Specialist who will verify the guest's age through valid photo identification in accordance with 16 CCR §5402. Security Specialists also serve a concierge role for all incoming guests - answering questions, connecting customers with appropriate service staff, and generally supporting positive interactions with guests and members of the community. Upon determining whether a guest is a medical or adult use customer, the Reception Specialist will direct the customer to the appropriate part of the sales floor and connect him/her with sales staff.

## **Secured Products**

Old School Cannabis will feature an open-floor layout with checkout counters that project into the sales floor from the wall. Small quantities of each product offering will be exhibited in glass display cases lining the outer walls of the sales floor, with medical and adult use products displayed in separate sections of the store. Cannabis flower samples will be displayed in containers that facilitate smell and visual inspection, and upon expiration will be disposed of in accordance with Bureau of Cannabis Control regulations.

Old School Cannabis Customer Service Specialists will be an active presence throughout the sales floor—offering support and information to browsing customers. Customer Service Specialists will carry digital tablets enabling them to provide greater detail on individual product offerings, sending order requests to the back of the house for fulfillment and packaging, and transferring information to the point of sale (POS) system.

When a customer is ready to make a purchase, sales specialists on the floor will direct the customer to the appropriate counter staff, where separate medical and adult use POS systems will occupy corresponding locations along the checkout counter. When necessary during particularly busy periods, a service line stanchion will be utilized to control customer flow at the counter. Upon completing the transaction, all cannabis products will be placed into opaque and, if applicable, child-resistant exit packaging before departing the premises in accordance with 16 CCR §5029 and §5413.

Cannabis and cannabis products will be stored in secured access of the retail facility. The delivery component of the facility will not store any cannabis inventory other than that which has been prepared to order and awaiting pick up by a delivery driver. The facility is designed to prevent unauthorized entrance into areas containing cannabis and cannabis products with limited access areas accessible only by authorized personnel. All guests must arrange a site visit beforehand and must provide a valid government-issued photo identification card to gain entry. All guests must be over the age of 21. Each guest will be logged for recordkeeping purposes.

## **Display a copy of issued State License**

Old School Cannabis will display a copy of the issued state license in a prominent and conspicuous place inside the retail facility in compliance with Per SRCC §20-46.080)(F)(1),

## **Delivery, On-Site Consumption, Special Events**

### **Delivery**

Our operations protocol for delivery of products to retail customers serves as the rules for running a compliant delivery operation. Management will regularly examine our operations, along with legal counsel, to confirm that we are meeting all of our state and local compliance obligations, as well as conforming to our commitment to the City of Santa Rosa and the communities in which we deliver. To the extent the managers of Old School Cannabis determine that an operational change is warranted, we will ensure all updates to the operations plan are timely and effectively implemented.

### **Delivery Operations Plan**

Once a delivery order is pulled, properly packaged in exit packaging, and approved for delivery, the delivery driver will be assigned a delivery vehicle and the driver will secure the products with a copy of

their associated receipts attached in the safe-style lockbox located in the trunk of the vehicle. The driver will then conduct a visual inspection of the exterior of the vehicle to ensure the tires are full of air, there are no signs or flyers attached to the vehicle, and to ensure, among other things, the safety of the vehicle in general. Once vehicle safety is confirmed, the driver will enter the vehicle. Once inside the vehicle, the driver will ensure he or she has duplicate copies of the delivery receipt(s) related to the delivery(ies) to take place, a copy of the Licensee's BCC retail license, his or her own driver's license, the insurance information and registration for the vehicle, his or her company-issued cell phone, a pen, and his or her delivery ledger. Additionally, the delivery driver will ensure he or she is wearing his or her employee ID badge. Once all necessary items have been confirmed and the vehicle has been deemed safe for delivery, the delivery driver will input his or her first destination into the provided cellphone's GPS application and proceed on the delivery route.

While in transit, cannabis, cannabis products, and payments will always be secured in the safe-style lock box that is secured in the trunk area. To further safeguard cannabis and cannabis products on route to customers, and in accordance with BCC regulations, when a driver exits the delivery vehicle, all cannabis and cannabis products not being delivered to a particular address will remain in the properly secured lock box within the closed, locked, and alarmed vehicle. Upon delivery, the customer will present their valid, government issued ID and sign the duplicate receipt to acknowledge the delivery has been completed. Additionally, drivers will possess no more than \$5,000 combined worth of product or cash at any time.

After all deliveries related to a particular delivery run are made, the delivery driver will return to the licensed premises. Upon arrival, an authorized employee (likely a manager) will meet the delivery driver and inspect the vehicle to ensure no cannabis products remain inside the vehicle. Additionally, the delivery driver will give the authorized employee all signed delivery receipts, all payments received, and the driver's delivery ledger. The authorized employee will reconcile all payments with the order receipts and log to ensure everything is accounted for. Once all documentation has been received, all updated and necessary information will be put into our point of sale system and the applicable track and trace system. Any returned or undelivered product will be returned to management for updates in the track and trace system and proper disposal pursuant to BCC Regulations, as applicable.

We expect that two staff members will be required to facilitate the function of delivery services. All delivery pick up from the delivery office will take place through the secured entrance, which is minimally visible to the public and is not available for public use. The rear entrance will also be covered by two dedicated surveillance cameras. 16 CCR §5422. Additionally, delivery pick up timing will vary from hour to hour in order to disrupt any attempt to establish reliable schedules by potential robbers. Prior to leaving the licensed premises to make deliveries, delivery employees will carry out a routine to ensure the delivery process occurs without incident.

### **On-Site Consumption**

Our facility will offer on-site consumption to those customers and cannabis patients who require a safe space to consume their cannabis. For this purpose the proposed area highlighted in the attached floor plan sketches the location and layout of the consumption lounge, which is partially outdoors and physically separated from neighboring parcels and uses.

## **On-Site Consumption Plan**

The consumption lounge is securely located beyond the security checks at the entrance of the retail facility. Consumption of cannabis on-site will comply with Chapter 9-20 of the City Code (Smoking Regulations) as well as state law.

Per the City of Santa Rosa's Comprehensive Cannabis Ordinance (§ 20-46.080 (F)) and Chapter 9-20 of the City Code (Smoking Regulations), a cannabis retailer cannot permit smoking or vaping on-site; therefore, our on-site consumption at Old School Cannabis is limited to using cannabis in non-combustible forms, such as edibles or topicals, among others.

The consumption lounge will be age restricted to patrons who are of 21 years of age or older. The entrance to a Cannabis Retail facility shall be clearly and legibly posted with a notice indicating that smoking and vaping of Cannabis is prohibited on site or in the vicinity of the site except as permitted in accordance with Chapter 9- 20 (Smoking Regulations) and state law. Our security team will monitor the consumption lounge in order to permit only patrons who are 21 years of age or older, as well as to restrict employees from utilizing the consumption lounge while on duty. Additionally, the security team will ensure compliance of these regulations and Chapter 9- 20 among our customers and employees alike.

## **Special Events**

We do not currently have plans for special events, however would like to reserve the ability to pursue special event permits in the future.

Old School Cannabis recognizes that state law requires Cannabis Businesses to obtain dual licensing at the state and local level for temporary special events that involve on-site cannabis sales to, and consumption by patients. Old School Cannabis also recognizes that such events shall not be allowed to commence until the Cannabis Business can demonstrate that all necessary local permits, state temporary event licenses, and agency permits have been obtained in compliance with any regulations and deadlines established by the City and the state.

In the event that Old School Cannabis pursues a special events permit, they will be filed in a timely manner in accordance with Section 20-52.040 ( Temporary Use Permit) or Chapter 11- 40 ( Special Events).

## **Storefront, Signage, and Window Treatments**

Final signage, storefront signs, and window treatments will comply with Section 20-38.060, Zoning District Sign Standards. Each sign shall comply with the sign type, area, height, and other restrictions provided by Santa Rosa City Code. Additionally, all storefront, signage and window treatments will comply with Zoning Code (Chapter 20-38 Signs) in order to protect the important aspect of the economic base of the City by preventing the destruction of our natural beauty and environment.

## **Hours of Operation**

Our retail facility will operate in compliance with operating hours restrictions and will be open from 9:00 a.m. to 9:00 p.m., seven days a week. Our delivery services will also comply with operating hour restrictions and will only operate within the hours of 9:00 a.m. to 9:00 p.m. up to seven days per week.

## Cultivation Use Specific Requirements

If approved by the city, we will operate in accordance with this Cultivation Use Plan and any associated plans or procedures that may be articulated as conditions of our conditional use permit. All plans are designed to adhere to Santa Rosa City Code (SRCC) Chapter 20-46, California Business and Professions Code §26000, and related city and state rules and regulations.

### Indoor Cultivation Only

Old School Cannabis recognizes that outdoor commercial cultivation is prohibited in Santa Rosa, and will only be cultivating cannabis within a fully enclosed permitted and licensed space. The total cultivation use area of indoor cannabis is 17,120 sq ft, with 10,000 sq ft being used exclusively for canopy.

### Non-Canopy Business Areas

As seen on the provided floor plan, several rooms of the cultivation facility are dedicated to non canopy area uses. These rooms consist of two drying rooms, a trimming room, a secured storage room, a facilities room, a hallway, electrical closet, janitorial closet, restrooms, a security room, and a packaging room. The total non-canopy business area gross sq ft is 7,120 sq ft.

### Pesticides

In compliance with Section 20-46.060 Old School Cannabis will conduct cultivation of cannabis in conformity with all relevant federal, state and local laws and regulations which govern the use of pesticides. If fumigation or insecticidal fogging is utilized, it will directly comply with the California Fire Code.

## Distribution Use Specific Requirements

Old School Cannabis intends to apply for a Type 11 Distribution license, with both the designations of Category M for medical-use products and Category A for adult-use products.

In summary, the California Code of Regulations, Title 16, Division 42. Bureau of Cannabis Control, Chapter 2. Distributors. Sections 5300, 5301 and 5303 states that a licensed distributor “shall distribute only cannabis goods, cannabis accessories, and licensees’ branded merchandise or promotional materials; may provide storage services; and may package, re-package, label, and re-label cannabis, including pre-rolls, for retail sale.”

Old School Cannabis will operate seven days a week from the hours of 6:00 a.m. to 9:00 p.m. Our distribution facility will have no public entry and will be locked at all times. Only owners, staff, contractors, and officials with local or state government will be allowed on the premises. Any guests will need to arrange their visits ahead of time and will need to sign in with an authorized Old School Cannabis employee. Upon arrival, all guests must provide a government-issued photo ID that confirms they are over 21 years of age. No one under the age of 21 will be allowed on the premises.

Any actions involving cannabis goods will be input into the track-and-trace system, METRC. We will ensure that hard copies of important documents are kept in a secured location on site, and we will store copies of important documents electronically.

## Track and Trace System

In compliance with §5048, Old School Cannabis will create and maintain a track and trace system account before we conduct any commercial cannabis activity. We will assign one owner-operator as the track and trace system account manager, and that person will attend and complete any required track and trace system training, orientation, or continuing education. The account manager will maintain a current list of track and trace system users including their full names and usernames.

We will maintain a record, outside of the track and trace system, that details each compliance notice we receive from track and trace and how and when we complied with it. If we cannot achieve compliance within three business days, we will alert the BCC immediately.

## Track and Trace Reporting

In order to adhere to §5049, we will record all commercial cannabis activity in the track and trace system, as required, including:

- Packaging of cannabis goods,
- Sale and transfer of cannabis goods,
- Transportation of cannabis goods to a licensee,
- Receipt of cannabis goods,
- Return of cannabis goods,
- Destruction and disposal of cannabis goods,
- Laboratory testing and results, and
- Any other activity, as required, pursuant to this division or by any other licensing authority.

All activity that we enter into the track and trace system will include:

- The name and type of cannabis goods,
- The unique identifier of the cannabis goods,
- The amount of cannabis goods by weight or count,
- Total wholesale cost of the cannabis goods, if applicable,
- The date and time of the activity or transaction, and
- The name and license number of all licensees involved in the activity or transaction.

If the goods are being transported, we will follow a shipping manifest generated through the track and trace system, which will include:

- The name, license number, and licensed premises address of the originating licensee;
- The name, license number, and licensed premises address of the licensee transporting the cannabis goods;



- The name, license number, and licensed premises address of the destination where the licensee is receiving the cannabis goods into inventory or storage;
- The date and time of departure from the licensed premises and approximate date and time of departure from each subsequently licensed premises, if any;
- The arrival date and estimated time of arrival at each licensed premises; and
- The driver's license number of the personnel transporting the cannabis goods and the make, model, and license plate number of the vehicle used for transport.

When Old School Cannabis picks up or receives cannabis goods for transport, storage, or inventory, we will make sure that the cannabis goods are as described in the shipping manifest. We will then record acceptance of the goods in the track and trace system. If there are any discrepancies between what is received and what is recorded on the shipping manifest, Old School Cannabis will record and document the difference(s) in the track and trace system.

If the cannabis goods are going to be disposed of, we will collect the following information and record it in the track and trace system:

- The name of the employee performing the destruction or disposal,
- The reason for destruction or disposal, and
- The name of the entity being used to collect and process cannabis waste, pursuant to §5055 of this division.

If cannabis goods spoil or are compromised for any reason, Old School Cannabis will record those instances in the track and trace system.

## Loss of Access

In compliance with §5050, if at any time Old School Cannabis loses the connection to the track and trace system, we will keep detailed records independent of the track and trace system and will notify the BCC of the disconnection immediately. Within three days of restoration, Old School Cannabis will transfer all independently kept records into the track and trace system.

## Track and Trace System Reconciliation

To adhere to §5051, Old School Cannabis will take inventory of both physical inventory and inventory listed in track and trace at least once every 30 calendar days. If there is a significant discrepancy between the two, we will conduct an audit and notify the BCC of any reportable activity pursuant to §5036 within 24 hours.

## Licensed Distributor to Licensed Distributor Transfers

In compliance with §5307.2, in order for Old School Cannabis to transfer cannabis goods to one or more licensed distributors, those cannabis goods will be packaged as they are to be sold at retail, after having passed compliance testing and been issued a certificate of analysis. If cannabis goods are not sent to retail within 12 months of the date listed on the certificate of analysis, those goods must be destroyed or retested by the distributor.

## Manufacturing Use Specific Requirements

The Applicant's proposed manufacturing project will include all activities permitted by the medical and adult use cannabis using volatile solvents (Type 7) license, including, but not limited to: extraction, processing, packaging, sorting, and grading.

The Applicant, as is required for state licensing, will prepare and implement standard operating procedures for all manufacturing processes and use of all equipment. Upon receipt of local authorization, the Applicant will apply for the annual state licenses through the Manufactured Cannabis Safety Branch of the California Department of Public Health ("CDPH") as required by Cal. Code Regs. tit. 17, § 40115 and § 40118(b). The Applicant will submit the application to the CDPH for a "Type 7 - Manufacturer 2" license as a manufacturer, and both a License "Category A" for adult-use products and a License "Category M" for medical-use products.

### Extraction

Pursuant to Section 20-46-070, Old School Cannabis will utilize only extraction processes that are a) solvent -free or that employ only non-flammable, nontoxic solvents that are recognized as safe pursuant to the federal Food, Drug, and Cosmetic Act (FDCA), and/ or ( b) use solvents exclusively within a closed loop system that meets the requirements of the federal FDCA including use of authorized solvents only, the prevention of off - gassing, and certification by a California licensed engineer.

Our extraction process will emulate clean lab standards, and all staff will receive in-depth workshops about contact contamination and proper use of gloves and other industrial hygiene and personal protective equipment. Input ingredients will be pre-tested for chemical contaminants. Established master formulas will produce a consistent product that can be titrated in finishing phases as needed. Old School Cannabis will partner with a licensed testing lab for internal quality controls and will submit our products for third-party testing when they enter the manufacturing channel via a licensed cannabis distributor.

### Closed Loop System

In accordance with Section 17.360.090 Cannabis Manufacturing, Old School Cannabis will not use a closed-loop system until said system has been inspected and approved by the Sebastopol City Building Official and Fire Chief.

### Standard of Equipment

Extraction equipment used by Old School Cannabis will be listed or otherwise certified by an approved third -party testing agency or licensed professional engineer and approved for the intended use by the City's Building Official and Fire Code Official. The below list of equipment is intended for us at this facility and will be certified by an approved third -party testing agency or licensed professional engineer and approved by Santa Rosa's Building Official and Fire Code Official.

**Equipment List**

Item No.	Name	Manufacturer	Model	Qty	Location	Voltage	Max Power	Dimensions	Cooling	Weight	Vac / Pressure	Listing	NOTES
1	Butane Extractor	Blizzybee	Large Quad Material Rack + Medium HEX Utility	1	C1D1 Space	N/A	N/A		Liq CO2			Peer Reviewed	
2	Vacuum Oven	Across International	A775x UL Vacuum Oven	1	Oven Room, Unrated	220V 1~	4.6kW	34.5 x 30 x 35.5"			Item 12D	UL	
3	Forced Air Oven	Across International	FO19440 UL Forced Air Oven	1	Oven Room, Unrated	208V 1~	3.8kW	33.5 x 34 x 52.25"				UL	
4	Cold Trap	Across International	T40x 316L UL Cold Trap V.3	1	Oven Room, Unrated	110V	730W	13 x 18 x 30"				UL	
5	Vacuum Pump	Agilent	IDP15 Scroll Pump	1	Oven Room, Unrated	110V		364 x 333 x 485mm				UL	
6	Recirculating Electric Heater	AEC	Trutemp TC131	1	Unrated Space	480V	36kW	28x14x51"	Air			QPS	Capacity for 2 extractors

**Gas Detection Equipment List**

Item No.	Name	Manufacturer	Model	Qty	Control Area
G1	Stand Alone Gas LEL Detector - Butane	RKI	M2A - LEL	1	C1D1
G1	Stand Alone Gas LEL Detector - CO2	RKI	M2A - CO2	1	C1D1
G2	Portable Gas LEL Detector	RKI	Eagle 2	1	C1D1

## Edible Product Manufacturing

Old School Cannabis will not be producing edible products through this manufacturing facility at this time, but may apply for such uses in the future, in which case, will pursue the appropriate permit for such uses from the Sonoma County Health Department.

## Equipment and Utensils

In compliance with *Cal. Code Regs. tit. 17, § 40243*, Old School Cannabis will maintain adequate cleanliness of all equipment and utensils to avoid cross-contamination and adulteration of cannabis, which includes installing them in a way that allows adequate cleaning of the equipment and adjacent space. All cannabis product-contact surfaces will be corrosion-resistant, made from non-toxic materials, able to withstand their intended uses, and will be maintained to prevent allergen cross-contact. All seams on cannabis product-contact surfaces will be maintained to minimize the opportunity for cross-contamination and the growth of microorganisms. We will also ensure that all equipment, utensils, and product-contact surfaces are used appropriately.

Equipment will be used per the operating instructions to avoid the adulteration of cannabis products with lubricants, fuel, metal fragments, contaminated water, or any other contaminant. Our quality control program for cleaning, sanitizing, and maintenance of equipment and utensils will include a detailed written procedure, including a log, for cleaning, sanitizing, maintaining and calibrating equipment to protect against contamination, a schedule and procedure for documentation of the date and time of maintenance, cleaning, and sanitizing of equipment.

## State Compliance

### Premise

To comply with the *California Code of Regulations, Title 16, Division 42, § 5025*, the Old School Cannabis facility will be made available for inspection by the BCC at any time. Additionally, no oil diffusers or any other devices designed to disperse vapor will be used to disperse cannabis vapor into the air of the

premises. Old School Cannabis will maintain all grounds, buildings and manufacturing premises in compliance with *Cal. Code Regs. tit. 17, §40240* . Our grounds-maintenance plan will positively contribute to our surrounding areas and help ensure that these areas are safe and pleasant places to conduct business.

## Exterior Facility and Grounds

The licensed facility exterior and grounds at Old School Cannabis is equipped with draining areas to prevent pooled or standing water. Weeds, grass, and vegetation will be cut within the immediate vicinity of the cannabis manufacturing premises. All litter and waste will be removed, and equipment stored to minimize the potential for breeding or attracting pests. Roads, yards, and parking lots will be maintained so that those areas will not be a source of contamination in areas where cannabis products are handled or transported. All openings to the building, such as windows and vents will be screened, sealed, and protected to minimize potential for pests to enter the building. Waste treatment and disposal systems will be maintained to prevent contamination in areas where cannabis products may be exposed to waste. We will inspect and exterminate using approved insecticide or pesticide to eliminate any pests, dirt, and filth that could potentially contaminate the cannabis product.

## Interior Facility

The interior facility of Old School Cannabis will be designed and maintained in accordance with *Cal. Code Regs. tit. 17, 40240(b)* . The walls, ceilings, and floors will be constructed of material that is smooth, nonporous, easily cleanable, corrosion-resistant, and suitable for manufacturing processes. Fixtures, ducts, and pipes will not pose a source of drip or condensate that may contaminate cannabis products, surfaces or packaging materials.

## Plumbing System and Fixtures

Old School Cannabis will ensure running water will be supplied in all areas where the processing of cannabis products occur, in all areas used for the cleaning of equipment, utensils, and packaging materials, and for employee sanitary facilities. Water that contacts cannabis components, products, surfaces, or packaging materials will be potable. Plumbing systems will meet all requirements of *Health and Safety Code § 114190* and are maintained so as to prevent any contamination, and shall be kept clean, fully operative, and in good repair.

Our sewage system will be plugged into Santa Rosa City's waste management system and will meet all requirements of the *California Code of Regulations, California Plumbing Code Part 5 of Title 24*. The sewage system will be maintained and kept in good repair so that it does not pose a potential source of contamination to cannabis products, surfaces or packaging materials. Our premises will provide our employees with access to adequate and readily accessible toilet facilities and handwashing stations meeting *Health and Safety Code § 114250*, will be kept clean, and will not pose a threat for potential source of contamination. Our premises will also be equipped with hand-washing facilities in accordance with *Health and Safety Code § 113953(a-d)*. Our running water used for handwashing will be at least 100 degrees Fahrenheit to prevent the spread of microorganisms. Cannabis waste will be disposed of in compliance with *Cal. Code Regs. tit. 17, § 40290* .

## Ventilation

Ventilation systems will be designed to provide sufficient ventilation to facilitate proper cannabis storage and to provide a reasonable condition of comfort for each employee, consistent with the job performed by the employee. In addition, toilet rooms will be vented to the outside air consistent with local building codes. Heating, ventilating, and air conditioning systems shall be designed and installed so that make-up air intake and exhaust vents do not cause contamination of cannabis, cannabis-contact surfaces, equipment, or utensils and do not create air currents that cause difficulty in maintaining the required temperatures of potentially hazardous materials. Ventilation systems will be maintained in accordance with *Health and Safety Code § 114149 and 114149.3*.

## Cleaning and Maintenance

Old School Cannabis's premises and fixtures will be maintained in a clean and sanitary condition and kept in good repair to prevent cannabis products from becoming adulterated, and will be free of litter and items that are unnecessary to the operation such as removing equipment that is no longer used or functional. At least one curbed cleaning facility or janitorial sink will be equipped with hot and cold water and a drain shall be provided and conveniently located for the cleaning of mops or similar wet floor cleaning tools and for the disposal of mop water and similar liquid waste. All cleaning equipment and supplies will be stored and separated from any food preparation or storage area. All poisonous or toxic materials such as cleaning compounds, sanitizing agents, and pesticides will be handled and stored in a way that clearly identifies the toxic material and that will not contaminate or be stored above food, equipment, or utensils. Containers used to store toxic materials will not be used to store, transport, or dispense cannabis products.

## Energy Conservation and Other Environmental Aspects

Old School Cannabis will replace many existing lights with LED lights in our facility to ensure electricity is conserved. We will maintain enrollment in the Sonoma Clean Power Evergreen option that will provide us with one hundred percent renewable energy. We will plan to work with our local waste hauler to recycle and compost as much of our waste as possible, including recycling and green bin waste.

Protecting the environment is at the core of Old School Cannabis. We can either hurt or help our environment with our everyday actions, and we are committed to making sure we limit our carbon footprint, use of electricity, and our water consumption as much as is possible. We hope that in doing so we match and raise the bar for other cannabis companies in Santa Rosa and beyond to take stock of their environmental outlook and make changes as needed.

## Premises Location

Old School Cannabis's facility is in compliance with *Cal. Code Regs. tit. 16 § 5026* and the existing City Zoning Code. The facility is not in a location in which a person must pass through a private residence or a business that sells alcohol or tobacco to enter the licensed premises. Additionally, our manufacturing operation is not located in a private residence.

## Physical Modification of Premises

In compliance with *Cal. Code Regs. tit. 16 § 5027*, Old School Cannabis will not make physical changes, modifications, or alterations to our facility if those changes, modifications, or alterations substantially alter the premises or the use of the licensed premises from the premises diagram submitted to the BCC.

In compliance with *Cal. Code Regs. tit. 17, §40236*, the design and construction of our facility Old School Cannabis will ensure the safety of customers and employees as well as sanitary operations for our cultivation and manufacturing processes. We will use materials for our floors, walls, and ceilings that can be easily kept in sanitary condition. Our floors and walls will be properly sealed to ensure they are kept clean and that there is no product cross-contamination. All cannabis product-contact surfaces will be made from non-porous materials, and will be kept in a sanitary and good working condition.

The design of our facility will prevent cross-contamination and will allow for safe working conditions. This will include providing adequate lighting throughout our unit to ensure accuracy and safety across all our uses and processes.

Our design will also include installing an adequate HVAC system to minimize the presence of dust and unwanted odors throughout our facilities.

We will also ensure that our construction plans comply with the American Disabilities Act and create an accessible working environment for all.

## Subletting of Premises

In accordance with *Cal. Code Regs. tit. 16 § 5028*, Old School Cannabis will not, under any circumstance, sublet any portion of our licensed facility's premises.

## Licensee's Responsibility for Acts of Employees and Agents

Old School Cannabis will implement written procedures for all personnel regarding sanitary practices in accordance with *Cal. Code Regs. tit. 16 § 5030*. Our personnel will comply with strict cleanliness procedures to prevent allergen cross-contact and product contamination. These procedures will include wearing appropriate and clean outer garments, maintaining personal cleanliness, washing hands thoroughly, removing all unsecured jewelry and other objects, using gloves, and wearing hair coverings.

Personal belongings will be stored in a separate area away from the cannabis operations. Another area will be created for food eating and beverage drinking. There will be no tobacco use on-site. Personnel will receive regular trainings on cleanliness, hygiene, and cross-contamination, and signs will be posted as reminders of policies such as handwashing and allowable food areas. We will also employ strict disease control measures to prevent the contamination of any cannabis products, contact surfaces, or packaging materials.

## Age Restriction

To comply with *Cal. Code Regs. tit. 16 § 5031* Old School Cannabis will only employ adults over the age of 21. Additionally, persons under 21 years of age will not be allowed inside the premises at any time, with

the limited exception of medical patients of at least 18 years of age with a valid physician's recommendation in their possession.

## **Designated M and A Commercial Cannabis Activity**

In accordance with *Cal. Code Regs. tit. 16 § 5032*, Old School cannabis will only conduct commercial cannabis business with other cannabis businesses that are licensed by the state of California. As previously noted, Old School Cannabis will seek both adult use (“A”) and medical (“M”) designations on its state licenses. As a business that intends to be licensed to distribute medical cannabis, we will distribute medical cannabis products to licensed retailers. However, any product labeled “For Medical Use Only” will only be distributed to M-designated retailers or authorized microbusinesses.

## **Storage of Inventory**

In compliance with *Cal. Code Regs. tit. 16 § 5033*, Old School Cannabis will securely hold all stored inventory in a limited-access area. At no time will cannabis goods be stored outdoors. Storage areas will be separated from bathrooms, changing rooms, and break rooms.

## **Significant Discrepancy in Inventory**

In compliance with *Cal. Code Regs. tit. 16 § 5034*, Old School Cannabis will closely monitor our inventory and any significant discrepancies. Section 5034 defines “significant discrepancy” as a change in actual inventory compared to records regarding inventory of at least 3 percent of a licensee’s average monthly sales. If Old School Cannabis discovers a significant discrepancy in its inventory, it will notify the BCC and local law enforcement within 24 hours of the discovery.

As defined by the BCC, average monthly sales will be calculated by averaging the total sales per month for the previous six months. If we have not been in business for six months when such calculations are necessary, we will utilize the averages of the months we have been in business. Additionally, our acquisition price may be used to determine the value of the cannabis goods in our inventory.

## **Notification of Criminal Acts; Civil Judgments; Violations of Labor Standards; and Revocation of a Local License, Permit, or Other Authorization after Licensure**

In compliance with *Cal. Code Regs. tit. 16 § 5035*, Old School Cannabis will alert the BCC in writing, by mail or electronic mail, in the case of a criminal conviction of any owner within 48 hours of the conviction. The notification will include the date of conviction, the docket number, the name of the court in which the owner was convicted, and the offense the owner was convicted of. We will also notify the BCC in writing of any civil penalty or judgment rendered against any owner of Old School Cannabis within 48 hours of the delivery of the verdict or judgment. This notification will include the court docket number, the name of the court, and a description of the civil penalty or judgment rendered against the owner. If there is an administrative order or civil judgment for violations of labor standards against Old School Cannabis or any owner in their individual capacity, we will alert the BCC within 48 hours in writing, either by mail or electronic mail. This notification will include the date of the order, the name of the agency issuing the

order, and a description of the administrative penalty or judgment rendered. We will notify the BCC in writing, by mail or electronic mail, if we experience the revocation of a local license, permit, or other authorization. This notification will include the name of the local agency involved, a written explanation of the proceeding or enforcement action, and the specific violation(s) that led to revocation.

Notifications required by this section will be submitted to the Bureau using the Notification and Request Form, BCC-LIC-027.

## **Notification of Theft, Loss, and Criminal Activity**

To comply with *Cal. Code Regs. tit. 16 § 5036*, Old School Cannabis will notify the BCC and local law enforcement within 24 hours of discovering any of the following situations:

- We discover a significant discrepancy in our inventory, as defined in § 5034.
- We discover diversion, theft, loss, or other criminal activity within the manufacturing operation.
- We discover a loss or unauthorized alteration of records in relation to cannabis goods, customers, or our employees or agents.
- We discover any other breach of security.

Notifications to the BCC will include the date and time of the theft, loss, or criminal activity, the name of the local law enforcement agency that was notified, and a detailed account of the incident, including the item(s) that were taken or lost.

## **Record Retention**

Pursuant to *Cal. Code Regs. tit. 16 § 5037*, Old School Cannabis will store and maintain the following records for at least seven years:

- Financial records, including bank statements, sales invoices, receipts, tax records, and all records required by the California Department of Tax and Fee Administration under Title 18, California Code of Regulations, sections 1698 and 4901;
- Personnel records, including each employee's full name, social security or individual tax payer identification number, date employment begins, and date of termination of employment (if applicable);
- Training records, including the content of the training provided and the names of the employees that received the training;
- Contracts with other licensees regarding commercial cannabis activity;
- Permits, licenses, and other local authorizations to conduct the licensee's commercial cannabis activity;
- Security records, except for surveillance recordings, required pursuant to § 5044 of this division;
- Records relating to the composting or destruction of cannabis goods;
- Documentation for data or information entered into the track-and-trace system; and
- All other documents prepared or executed by an owner or their employees or assignees in connection with the licensed commercial cannabis business



Further, the BCC will have our full consent to make any examination of Old School Cannabis's records or books that it considers necessary. All Old School Cannabis records will be kept in a way that provides easy access to the BCC through hard copy or electronic form. While we may utilize a third party to manage services of these records, we are ultimately responsible for the retention of these records under this section.

## Marketing & Advertising Placement

### License Post Requirement

In accordance with *Cal. Code Regs. tit. 16 § 5039*, Old School Cannabis's license will be displayed in the manufacturing facility in a location that is easy to observe by state and local agencies and other authorized visitors to the facility.

### Advertising Placement

In compliance with *Cal. Code Regs. tit. 16 § 5040*, any advertising or marketing placed by Old School Cannabis will adhere to the following standards:

- They will only be displayed after we have obtained reliable, up-to-date data on audience composition that demonstrates that at least 71.6 percent of the audience viewing the advertising or marketing is reasonably expected to be 21 years of age or older.
- They will not use any depictions or images of minors or anyone under 21 years of age.
- They will not contain the use of objects such as toys, inflatables, movie characters, or cartoon characters, nor will they include any other display, depiction, or image designed in any manner likely to be appealing to minors or anyone under 21 years of age.
- They will not advertise free cannabis goods or giveaways of any type of products, including non-cannabis products, such as contests, sweepstakes, or raffles; buy one product, get one product free offers; or offers of a "free" product with any donation.

Outdoor signage, including billboards, will be affixed to a building or permanent structure and comply with the provisions of the Outdoor Advertising Act. No outdoor signage will be located within a 15-mile radius of the California border on an interstate highway or on a state highway that crosses the California border.

In addition, Old School Cannabis will provide audience composition data to the BCC when necessary. We will remove any advertising or marketing that the BCC deems noncompliant with the standards in this section.

### Age Confirmation in Advertising

In compliance with *Cal. Code Regs. tit. 16 § 5041*, if Old School Cannabis chooses to utilize direct, individualized communication or dialogue (person to person, telephone, physical mail, or electronic mail) with a potential customer, Old School Cannabis will first use age affirmation to verify that the recipient is 21 years of age or older.

### **Branded Merchandise Approval**

In accordance with *Cal. Code Regs. tit. 16 § 5041.1* , if Old School Cannabis chooses to sell branded merchandise that is not listed in Section 5000, subsection (b), we will get express written permission from the Bureau before doing so.

### **Marketing Cannabis Goods As Alcoholic Products**

To comply with *Cal. Code Regs. tit. 16 § 5040.1*, SOld School Cannabis will not sell or transport any cannabis goods labeled as beer, wine, liquor, spirits, or any other term that may create a misunderstanding that the product is an alcoholic beverage.

### **Security Measures**

As described above on page 14, Old School Cannabis has a robust security plan. For more information, please see our Operational Security Measures found within the Security Plan. (Attachment: Security Plan).

### **Limited-Access Areas**

In compliance with *Cal. Code Regs. tit. 16 § 5042* , Old School Cannabis will ensure that anyone on the premises of the facility who is not an employee or an otherwise authorized individual is under supervision at all times. Limited-access areas will have a door and a lock that meets the requirements of § 5046 and any door to a limited-access area will stay closed when not in use.

Old School Cannabis shall not receive consideration or compensation for permitting an individual to enter limited access areas. Evidence that an employee has done or attempted to do so will be grounds for termination.

### **Licensee Employee Badge Requirement**

In order to comply with *Cal. Code Regs. tit. 16 § 5043*, a plastic-coated or laminated identification badge will be worn by any agent, officer, employee, or other person representing or employed by Old School Cannabis during the time they are participating in commercial cannabis activity. This ID badge will include the Old School Cannabis name and license number as well as the wearer's first name, the wearer's employee number, and a 1" x 1.5" inch color photograph of the employee's full face.

### **Video Surveillance System**

In accordance with *Cal. Code Regs. tit. 16 § § 5044* , Old School Cannabis will have a digital video surveillance system. A minimum resolution of 1280 × 720 pixels will be required of each camera. Stored surveillance footage and/or our cameras will be transmission control protocol (TCP) capable for access via the internet. Every camera will be mounted permanently in a fixed location and be capable of effectively and clearly recording images of areas under surveillance. Any area where cannabis goods are weighed, packed, stored, loaded and unloaded for transportation, prepared, or moved will be under video surveillance. All limited-access areas, security rooms, and all exits and entrances to the facility (recorded from both indoor and outdoor vantage points) will be covered by video surveillance. All cameras will run 24 hours a day, seven days a week, and video will include a time and date stamp. Recordings will be kept

for 90 days at a minimum. Old School Cannabis will share any of our surveillance recordings with the BCC and local police upon request.

The physical media or storage device on which surveillance recordings are stored will be secured in a manner to protect the recording from tampering or theft.

## Locks

To comply with *Cal. Code Regs. tit. 16 § 5046*, we will ensure that Old School Cannabis's limited-access areas can be securely locked with commercial-grade, nonresidential door locks. Additionally, all entrance and exit doors to the facility will utilize commercial grade, nonresidential door locks on all entrance and exit doors to the facility.

## Alarm System

In compliance with *Cal. Code Regs. tit. 16 § 5047*, Old School Cannabis will install an alarm system and hire a licensed alarm company operator to ensure the system is maintained, monitored, and responded to. Any information we have in regards to the alarm system, monitoring, and alarm activity will be made available to the BCC upon request.

## Track-and-Trace Requirements

In accordance with *Cal. Code Regs. tit. 16 § 5048*, before conducting any commercial cannabis activity, Old School Cannabis will create and maintain a track-and-trace system account. We will assign one owner-operator as the track-and-trace system account manager. The account manager will be responsible for attending and completing any required track-and-trace system training, orientation, or continuing education. The account manager will also be responsible for maintaining a current list of track-and-trace system users, including their full names and usernames.

## Track-and-Trace System

Old School Cannabis will maintain a record independent of METRC that will detail each compliance notice received from track-and-trace. The record will include the notice and detail how and when Old School Cannabis complied with it. If compliance can not be achieved in three business days, we will alert the BCC.

If, for any reason, the State's track-and-trace system is not available at the time Old School Cannabis obtains its state license, Old School Cannabis will use an independent system to track-and-trace product as required.

## Track and Trace Reporting

In order to adhere to *Cal. Code Regs. tit. 16 § 5049*, Old School Cannabis will record the following commercial cannabis activity in the track-and-trace system:

- Packaging of cannabis goods
- Sale and transfer of cannabis goods
- Transportation of cannabis goods to a licensee

- Receipt of cannabis goods
- Return of cannabis goods
- Destruction and disposal of cannabis goods
- Laboratory testing and results
- Any other activity as required pursuant to this division, or by any other licensing authority

Activity entered into the track-and-trace system will include the following:

- Name and type of cannabis goods
- Unique identifier of the cannabis goods
- Amount of cannabis goods by weight or count
- Wholesale cost of the cannabis goods if applicable
- Date and time of the activity or transaction
- Name and license number of other licensees involved in the activity or transaction

If the goods are being transported, we will follow a shipping manifest generated through the track-and-trace system, which will include all of the following information:

- Name, license number, and licensed premises address of the originating licensee
- Name, license number, and licensed premises address of the licensee transporting the cannabis goods
- Name, license number, and licensed premises address of the destination licensee receiving the cannabis goods into inventory or storage
- Date and time of departure from the licensed premises and approximate date and time of departure from each subsequently licensed premises, if any
- Arrival date and estimated time of arrival at each licensed premises
- Driver's license number of the personnel transporting the cannabis goods and the make, model, and license plate number of the vehicle used for transport

Before official receipt of cannabis goods for transport, storage, or inventory, Old School Cannabis will make sure that the cannabis goods that we take possession of are as described in the shipping manifest. We will then record acceptance of the goods in the track-and-trace system. If there are any discrepancies between what is physically received and what is recorded on the shipping manifest, we will alert the licensee transporting the cannabis goods and document the difference(s) in the track-and-trace system.

We will collect the following information and record it in the track-and-trace system if cannabis goods are to be destroyed or disposed of:

- Name of the employee performing the destruction or disposal
- Reason for destruction or disposal
- Name of the entity being used to collect and process cannabis waste

If the cannabis goods are compromised for any reason or if there is any kind of spoilage, Old School Cannabis will record it in the track-and-trace system.

## Loss of Connectivity

In order to comply with *Cal. Code Regs. tit. 16 § 5050*, if Old School Cannabis loses connection to the track-and-trace system, we will keep detailed records independent of the track-and-trace system and will notify the BCC of the disconnection immediately. After the restoration of the track-and-trace system, Old School Cannabis will have three days to transfer all independently kept records into track-and-trace and will do so within the required timeline. Additionally, Old School Cannabis will document the cause for the loss of connectivity and the date and time for when connectivity to the track-and-trace system was lost and when it was restored.

## Track-and-Trace System Reconciliation

To comply with *Cal. Code Regs. tit. 16 § 5051*, Old School Cannabis will reconcile the physical inventory of cannabis goods at the licensed premises with the records in the track-and-trace database at least once every 30 calendar days. If there is a significant discrepancy between the two, Old School Cannabis will immediately notify the BCC.

## Returns and Destruction

### Acceptance of Shipments

In compliance with *Cal. Code Regs. tit. 16 § 5052.1*, no partial shipments of goods will be accepted. Old School Cannabis will accept or reject all shipments in whole. Exceptions permitting rejection of a partial shipment include if part of a shipment is not listed on the shipping manifest, the shipment is wrongly listed, part of a shipment is not compliant with labeling requirements, part of a shipment was damaged during transportation, or the shipment is past its best-by date. If Old School Cannabis does need to refuse a shipment, in whole or in part, it will be recorded in the track-and-trace system and notated on the documentation why it was rejected.

### Returns Between Licenses

In accordance with *Cal. Code Regs. tit. 16 § 5053*, Old School Cannabis may return manufactured cannabis goods to the selling licensee if we find those goods are defective. They may be exchanged for either a nondefective version of the exact same manufactured cannabis good or for a manufactured cannabis good of equal value.

### Destruction of Cannabis Products Prior to Disposal

To adhere with *Cal. Code Regs. tit. 16 § 5054*, all Old School Cannabis's cannabis waste will be disposed of in full compliance with state and local laws. All cannabis products will be unrecognizable and unusable at the time of disposal. All cannabis waste will be kept in a locked waste receptacle that will be hauled away by Recology. All cannabis waste will be entered into METRC.

## Quality Assurance Review

In compliance with *Cal. Code Regs. tit. 17, § 40235 through 40258*, Old School Cannabis will implement quality assurance review under the supervision of personnel assigned to ensure that cannabis products and product-packaging materials are not adulterated or misbranded, and safe for human consumption and use.

Our quality assurance review and operations will cover the: grounds, building, and manufacturing premises; equipment and utensils; personnel; cannabis product components; and manufacturing processes and procedures.

Our quality assurance review will have written procedures and schedule for the cleaning, sanitizing, and maintenance of equipment. This will include a log documenting the date and time of maintenance, and a detailed procedure for storing cleaned and sanitized equipment and utensils to protect against contamination.

Our extraction process will emulate clean lab standards, and all staff will receive in-depth workshops about contact contamination and proper use of gloves and other industrial hygiene and personal protective equipment. Input ingredients will be pre-tested for chemical contaminants. Established master formulas will produce a consistent product that can be titrated in finishing phases as needed. Old School Cannabis will partner with a licensed testing lab for internal quality controls and will submit our products for third-party testing when they enter the manufacturing channel via a licensed cannabis distributor.

## Inventory Control

In compliance with *Cal. Code Regs. tit. 17, § 40282* , we will establish and implement a written inventory control plan that will track the location and disposition of all cannabis and cannabis products at our licensed premises. Our inventory will be reconciled at least once every 30 days and will be in compliance with the state track-and-trace system, METRC. We will conduct an audit in the event of a discrepancy between the on-hand inventory and the track-and-trace database and will notify the State Department of Public Health within 24 hours if the inventory reconciliation or audit conducted reveals a discrepancy that is more than five percent of the documented inventory.

## Personnel

Old School Cannabis will implement written procedures for all personnel regarding sanitary practices in accordance with *Cal. Code Regs. tit. 17, § 40246* . Our personnel will comply with strict cleanliness procedures to prevent allergen cross-contact and product contamination. These procedures will include wearing appropriate and clean outer garments, maintaining personal cleanliness, washing hands thoroughly, removing all unsecured jewelry and other objects, using gloves, and wearing hair coverings.

Personal belongings will be stored in a separate area away from the cannabis manufacturing operations. Another area will be created for food eating and beverage drinking. There will be no tobacco use on-site. Manufacturing personnel will receive regular trainings on cleanliness, hygiene, and cross-contamination, and signs will be posted as reminders of policies such as handwashing and allowable food areas. We will also employ strict disease control measures to prevent the contamination of any cannabis products, contact surfaces, or packaging materials.

## Cannabis Product Components

In compliance with *Cal. Code Regs. tit. 17, § 40248* , Old School Cannabis will implement policies and procedures to ensure and maintain the quality of product components, including raw materials or other components. All product components will be inspected upon intake to ensure they are clean and suitable

for processing and will be stored to protect against cross-contamination and minimize deterioration. Raw materials will be washed or cleaned as necessary to remove soil and other visible contaminants; water used for washing cannabis product ingredients will be potable. All product components will not contain levels of microorganisms that will injure human health, or the product will be pasteurized or otherwise treated during manufacturing so that they no longer contain microorganism levels that would cause the cannabis product to be adulterated. No product component will exceed the generally accepted limits of aflatoxin or other natural toxins, pests or extraneous materials as set by the U.S. Food and Drug Administration Defect Levels Handbook (Rev. February 2005) before being incorporated into finished cannabis products.

The holding and storage of raw materials and other components will be compliant with *Health and Safety Code sections 114047(a-b), 114049, and 114051*. All product components will be held in containers designed to protect against cross-contamination and will be held at temperatures and relative humidity levels to prevent the cannabis products from becoming adulterated. Frozen raw materials and other components will be kept frozen unless thawing is required prior to use, which will be done in a manner that prevents the components from becoming adulterated. We will identify any raw materials or components that are food allergens and will be held to prevent cross-contamination with other raw materials.

## **Manufacturing Practices and Procedures**

In compliance with *Cal. Code Regs. tit. 17, § 40250*, Old School Cannabis will implement and maintain manufacturing process and procedures that ensure cannabis product quality and will be identified in a product quality plan. We will maintain written master manufacturing protocols for each unique formulation of manufactured cannabis products to ensure the cannabis product contains the intended components and that they are properly packaged and labeled. We will maintain written batch production records to document the production process and to ensure that the preventative measures and master manufacturing protocols are being properly implemented. We will make all manufacturing records available to the California Department of Public Health upon request.

## **Product Quality Plan**

In compliance with *Cal. Code Regs. tit. 17, § 40253*, Old School Cannabis will implement a written Product Quality Plan (PQP) for each type of cannabis product manufactured at our premises and will make all plans and documentation available for California Department of Public Health review upon request. The PQP will address the hazards associated with the premises or manufacturing process that may lead to the cannabis product being adulterated or misbranded or cause it to fail laboratory testing or quality assurance review.

We will conduct a comprehensive assessment of our overall manufacturing process, and we will identify each step from component intake through transfer of product from the premises. We will determine the potential risks associated with each step and identify preventative measures to mitigate the potential risks. We will establish methods to evaluate and monitor the effectiveness of the preventative measures and take actions when necessary if preventative measures are unsuccessful.

Our PQP will evaluate the following potential risks to cannabis product quality: biological and microbiological hazards; chemical hazards, including radiological, pesticide contamination, solvents, natural toxins, decomposition, or allergens; physical hazards such as stone, glass, metal fragments, hair, or

insects; and process failures that may lead to product contamination, allergen cross-contamination, packaging errors, and labeling errors. Our PQP will identify the preventative measures used to mitigate each potential risk, such as cleaning and sanitizing of equipment and utensils or establishing an allergen control program to prevent cross-contamination between product types.

The PQP will identify methods to evaluate the effectiveness of the preventative measures against potential risks, which shall include reviewing contamination test results, reviewing cleaning and maintenance logs, and monitoring the temperature of raw materials that need to be held below 41 degrees Fahrenheit. The PQP will identify actions to be taken if the evaluation and monitoring indicates a risk was not properly mitigated, and will include specific information as to the type of product under evaluation and the specific risk to be mitigated. Old School Cannabis may take corrective actions such as destroying the product components, destroying the finished product, further processing the cannabis extract to remove impurities, or reworking the unfinished product to further homogenize the cannabinoids.

## Master Manufacturing Protocols and Batch Production Records

Old School Cannabis will create a written Master Manufacturing Protocol for each cannabis product we manufacture and for each batch size to ensure consistency among finished batches in order to prevent adulteration through incorporation of incorrect amounts of cannabinoids, unintended ingredients, or hazards identified in the PQP. These detailed protocols will comply with *Cal. Code Regs. tit. 17, § 40255* and will include the information detailed in this section, everything from the parameters of each ingredient used to the parameters of every component. Due to the level of detail included in the master manufacturing protocols for each of our cannabis products, they will be subject to trade-secret protection.

Input ingredients will be pre-tested for potency as part of the batch formulation. The Master Manufacturing Protocols will be used to create our Batch Production Records to ensure uniformity among our products and consistent potency across consecutive batches in the final product. In compliance with *Cal. Code Regs. tit. 17, § 40258*, our Batch Production Records will document in great detail every aspect of the creation of our manufactured products relating to the production and control of each batch, including the Certificate of Analysis issued for the batch.

## Standard Operating Procedures

Old School Cannabis will implement written standard operating procedures (SOPs) in accordance to *Cal. Code Regs. tit. 17, § 40275*. The operating procedures will include: security policies and procedures, emergency response procedures including safety data sheets for any chemicals on-site, manufacturing procedures, product and process control procedures, track-and-trace requirements, inventory control procedures, and cannabis waste management procedures. Our standard operating procedures will be revised periodically so they are always up to date. We will assign a high-level manager to stay up to date with the state regulations and update our SOPs as necessary. This manager will conduct appropriate staff trainings whenever changes occur. Our standard operating procedures will be written in English and may be made available in other languages as needed by personnel.



## Weights and Measures

In accordance with *Cal. Code Regs. tit. 17, § 40277* , all weighing devices will be approved, tested, sealed, and registered with the County Sealer in compliance with the *Business Professions Code Chapter 2 and Chapter 5*. Registered devices are to be used when cannabis and non-manufactured cannabis products are bought or sold by weight or count, when cannabis and non-manufactured cannabis products are packaged for sale by weight or count, when cannabis and non-manufactured cannabis products are weighed or counted for entry into the track-and-trace system, and when the weighing device is used for commercial purposes. We will ensure that all of the weights we use for these purposes are registered.

## Training Program

All employees will be trained appropriately, and further training will be readdressed annually. Old School Cannabis will train all staff and will implement a training program that addresses the following: applicable State of California, City of Santa Rosa, and Sonoma County Health Services laws, regulations and conditions of approval; information regarding civil, criminal and administrative liability; safety and security procedures; incident reporting, law enforcement liaison policies; and our Good Neighbor Policy. All employees will receive training within 30 days of the start of employment regarding: health and safety hazards, chemical hazards, emergency response procedures, security procedures, record keeping requirements, and training requirements.

Per *Cal. Code Regs. tit. 17, § 40280* , all Old School Cannabis employees will receive the following training before independently engaging in any manufacturing process and annually thereafter: an overview of the manufacturing process and standard operating procedures; quality control procedures; product quality plans; safe usage of equipment and safe work practices; cleaning and maintenance requirements, emergency operations; and any other information reasonably related to the employee's job duties. All annual training will be completed within 12 months of the previous training date.

The training records that will be maintained will include: a list of all personnel at the premises including name and job duties; documentation of training topics and dates of training completion; signature of each personnel and licensee verifying receipt of training or refresher training completed by the individual; any documentation attesting to the successful completion of the required training.

Training records will be maintained and provided to the California Department of Public Health and to the Santa Rosa Police Department upon request.

## Waste Management Procedures

In compliance with *Cal. Code Regs. tit. 17, § 40290* , we will implement a written cannabis waste management plan and all cannabis waste will be disposed of in full compliance with all laws. All cannabis waste will be removed from its packaging and rendered unrecognizable and unusable at the time of disposal. All cannabis products and waste will be stored and secured in a manner that prevents diversion, theft, loss, hazards and nuisance. All cannabis waste will be entered into the state's track-and-trace system, METRC. All cannabis waste will be placed in a locked waste receptacle that will be hauled by our permitted

waste-hauler, Recology. We will obtain proper documentation from Recology indicating subscription to their waste-collection service.

In compliance with *Cal. Code Regs. tit. 17, § 40240 and § 40290*, all non-cannabis waste will be stored and properly disposed of to minimize attracting pests and protect against cross-contamination of cannabis products, ground and product surfaces, packaging, and water supplies. We will properly evaluate all non-cannabis waste in accord with *Section 40141 of the Public Resources Code* in the management of hazardous waste.

## Product Complaints

In compliance with *Cal. Code Regs. tit. 17, § 40295*, Old School Cannabis will establish and implement written procedures to address all product complaints that are received via electronic, written, or oral communication expressing concern about the quality of a cannabis product relating to the manufacturing practice. Our quality control personnel will review and investigate all product complaints, maintain accurate records, conduct investigations or document bases for not conducting investigations and take action to correct any possible failures.

In compliance with *Cal. Code Regs. tit. 17, § 40292*, Old School Cannabis will provide the BCC, upon request, samples for the purposes of conducting oversight of licensed testing laboratories.

## Recalls

In compliance with *Cal. Code Regs. tit. 17, § 40297*, we will establish and implement written procedures to recall our cannabis products that are misbranded or adulterated. We will assign personnel to implement recall procedures and address factors that necessitated the recall. Our procedures will include factors which necessitate a recall, personnel responsible for implementing the recall procedures, customer notification protocols, and the collection and destruction of any recalled product. We will enter all recalled products into the track-and-trace database and documentation will be maintained onsite. All recalled products intended for destruction will be quarantined for at least 72 hours, after which the product will be rendered unusable and unrecognizable, and properly disposed of. We will enter the weight and count of the product, reason for destruction, and date the quarantine period will begin into the track-and-trace database to ensure recalled cannabis products intended for destruction are identified, weighed, and tracked while on the licensed premises. We will notify the California Department of Public Health within 24-hours of a recall.

## Prohibited Products

In compliance with *Cal. Code Regs. tit. 17, § 40300*, we will not produce any of the following as cannabis products: alcoholic beverages, products that contain nicotine or caffeine as additives, products that require they be held below 41 degrees Fahrenheit, thermally-processed low-acid cannabis products, any acidified cannabis products, any juice that requires refrigeration, dairy products of any kind, meat products (except dried meats), seafood products, commercially available candy or snack food that has cannabinoid concentrates applied to it, anything attractive to children, or a product resembling the shape of a human, animal, insect, or fruit.

## Edible Products

In compliance with *Cal. Code Regs. tit. 17 §40306*, Old School Cannabis will manufacture edible cannabis products including topical cannabis products, concentrates, and orally-consumed products.

## Topical Cannabis Products and Concentrates

Old School Cannabis will manufacture topical cannabis products that will only contain ingredients permitted for cosmetic manufacturing in accordance with Title 21, Code of Federal Regulations, Part 700, subpart B (section 700.11 et seq.). In compliance with *Cal. Code Regs. tit. 17 §40306 (b)*, These products will not contain more than 2,000 mg of THC per package.

## Orally-consumed Products Containing Alcohol

Old School Cannabis will manufacture any orally-consumed cannabis products as defined by *Cal. Code Regs. tit. 17, § 40100(hh)*. In compliance with *Cal. Code Regs. tit. 17 §40306 (a)*, our edible cannabis products will not contain more than 1,000 mg of THC per package.

## Failed Product Batches

In compliance with *Cal. Code Regs. tit. 17, § 40330*, no finished cannabis products will contain any contaminant identified in Section 26100 of the Act. Any failed product batches will be destroyed or remediated under the approval of the Department of Public Health. We will not remediate or reprocess any failed cannabis product until a corrective action plan addressing how the remediation will occur has been approved by the Department of Public Health. We will document all failed product batches and the remediation or reprocessing of a failed batch in our manufacturing records. We will notify the Department via email within three (3) days of notification of a failed product batch.

## Insurance Requirements

As outlined in § 5308, Old School Cannabis will provide the BCC with a certificate of insurance that displays the types of insurance we have and includes coverage and minimum amounts secured. As defined in this section, Old School Cannabis will always maintain commercial general liability insurance in the aggregate in an amount no less than \$2,000,000 and in an amount no less than \$1,000,000 for each loss. Moreover, we will secure this insurance from a company that meets one of these standards:

- A nonadmitted insurer that meets the requirements of Insurance Code § 1765.1 or 1765.2, and the insurance is placed pursuant to Insurance Code § 1763 and through a surplus line broker licensed under Insurance Code § 1765
- An insurer qualified to do business in California by the Secretary of State and authorized by the Insurance Commissioner to write the liability and property classes of insurance as defined by Insurance Code § 102, 103, 107, 114, 108, and 120
- A registered risk retention group compliant with the California Risk Retention Act of 1991

If Old School Cannabis should ever experience a lapse in insurance, we will notify the BCC within 10 calendar days.

## Labeling and Packaging

In accordance with *Cal. Code Regs. tit. 17, Subchapter 5. Labeling and Packaging Requirements*, all of Old School Cannabis's cannabis products will be properly labeled and packaged before they are released to a distributor in their final form for sale, except when the labeling of the cannabinoid content is to be added after issuance of the Certificate of Analysis. We will not require placing cannabis products into child-resistant packaging until December 31, 2019. All information provided on labels will be written in English and will be unobstructed and conspicuous to allow the consumer to easily read the information. All label information will be located on the outside container or wrapper of the product sold at the retailer. If the product container is separable from the outermost packaging, the product container for inhaled products will have the universal cannabis symbol per *Cal. Code Regs. tit. 17, § 40412*.

### Labeling Requirements: Pre-Rolls and Packaged Flower

In compliance with *Cal. Code Regs. tit. 17, § 40404*, the primary panel labels for all pre-rolls or packaged flower will include: the identity of the product, the net weight of cannabis in the package listed in both metric and U.S. customary units, and the universal cannabis symbol. The package will also have an informational label that will include: the unique identifier (UID), the contact information for the licensed cultivator or licensee packaging the product, the date of packaging for retail sale, and the required government warning statement:

“GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION.”

### Primary Panel Labeling Requirements: Manufactured Products

In compliance with *Cal. Code Regs. tit. 17, § 40405*, the primary panel labels of our manufactured cannabis products will include the identity of the product, the universal cannabis symbol, the net weight or volume of the contents of the package, and the content of THC and CBD of the entire package listed in milligrams.

### Informational Panel Labeling Requirements: Manufactured Products

In compliance with *Cal. Code Regs. tit. 17, § 40408*, the informational panel for our manufactured cannabis products will include our name and contact information, the date of manufacture and packaging, the required government warning statement, all product ingredients, instructions for use, the product expiration date, and the unique identifier (UID).

We will list all product ingredients and sub ingredients in descending order of predominance by weight or volume. If the cannabis product is perishable or perishable after opening, we will include

a statement to keep the product refrigerated after opening. Depending on the product packaging, we may place supplemental labeling on a package insert or fold-out.

### **Cannabinoid Content Labeling**

All of our manufactured products will contain the cannabinoid content and will comply with *Cal. Code Regs. tit. 17, § 40409* . The labeling for packages of pre-rolls or cannabis flowers will include the cannabinoid content expressed as a percentage if the flower does not include cannabinoids other than those that naturally occur in the plant material. We may arrange for cannabinoid content labeling after the issuance of the Certificate of Analysis. When this occurs, we will ensure each package of cannabis product is labeled in compliance with *Cal. Code Regs. tit. 17, § 40409(a)* , and we will identify a location for the cannabinoid content label on the outer packaging which will be sufficient in size and not obscure any other label information.

### **Labeling Restrictions**

In compliance with *Cal. Code Regs. tit. 17, § 40410* , our labels will not contain misinformation regarding the appellations of our cannabis, content that is designed to be attractive to individuals under the age of twenty-one, any information that is false or misleading, any untrue or misleading health-related statements. None of our products will contain the word “organic” unless the product meets the requirements for designation and certification as organic by the National Organic Program.

### **Potential Effects**

In compliance with *Cal. Code Regs. tit. 17, §40411* , our cannabis products will include information on the potential effects of the cannabis product if we have substantiation that the information is truthful and not misleading. We will locate this information on the informational panel of the label or as an insert included in the product package.

### **Universal Symbol**

In compliance with *Cal. Code Regs. tit. 17, §40412*, we will mark, stamp, or otherwise imprint our products with the universal symbol that will be no smaller in size than half (.5) inch by half (.5) inch and shall be printed legibly and conspicuously.

### **Packaging**

In compliance with *Cal. Code Regs. tit. 17, § 40415* , our packaging will protect the cannabis product from contamination and exposure to toxic or harmful substances, and will be tamper-evident. If the product has multiple uses, the package will be resealable. Our packaging will not be designed to imitate any package used for products typically marketed to children. Beginning in January 2020, all of our packaging will be child-resistant and will meet the requirements of *Cal. Code Regs. tit. 17, § 40417*.

## **Recordkeeping**

In compliance with *Cal. Code Regs. tit. 17, § 40500* , we will maintain the following documents immediately accessible at all times: our valid state license issued by the Department of Public Health; any other valid license issued by a state cannabis licensing agency; our valid approval issued by our local jurisdiction; our

premises diagram, as specified in *Cal. Code Regs. tit. 17, § 40131* ; our current standard operating procedures as defined in *Cal. Code Regs. tit. 17, § 40275* ; our shipping manifests; and our personnel records, including evidence of personnel qualifications and training procedures and logs, as specified in *Cal. Code Regs. tit. 17, § 40280*. In addition, we will maintain all contracts with other licensees and all financial records, including bank statements, tax records, sales invoices, and receipts regarding commercial cannabis activity.

These documents will be up-to-date, written in English, and immediately available for the Department of Public Health and any enforcement agencies for a period of at least seven years.

## Sales Invoices and Receipts

In accordance with *Cal. Code Regs. tit. 17, § 40505* , we will prepare sales invoices or receipts for every sale, transport, or transfer of cannabis product to another licensee. All of our invoices will include all of the necessary information to identify the purchaser and products being transferred as required in *Cal. Code Regs. tit. 17, § 40505(b)(1-6)* .

## Records

In compliance with § 5310, Old School Cannabis will maintain the following records:

- Records relating to branding, packaging, and labeling
- Inventory logs and records
- Transportation bills and shipping manifests for completed transports and for cannabis goods in transit
- Vehicle and trailer ownership records
- Quality-assurance records
- Records relating to the destruction of cannabis goods
- Laboratory-testing records
- Warehouse receipts
- Records relating to tax payments collected and paid under the *Revenue and Taxation Code § 34011 and 34012*

Hard copies of invoices, documents, and records will be kept on-site in a safe, and additional backups will be kept secure in digital form off-site.

## Shipping Manifest

In accordance with § 5314, before the transportation of any cannabis goods, Old School Cannabis will generate a shipping manifest via the track-and-trace system. Each manifest will be marked for either testing and sampling, the sale of cannabis goods to a licensee, destruction or disposal of cannabis goods, or any other activity as required by the BCC. Old School Cannabis will then send the shipping manifest directly to the BCC and to the licensee that is to receive the cannabis goods. This will be done before the goods have been transported by a licensed cannabis distributor.

## Conclusion

Thank you for your consideration of our application materials. We are dedicated to providing economic opportunities for our community members. With your support we look forward to the opportunity to demonstrate our ability to contribute meaningfully to Roseland and Santa Rosa.